

WRIA 16/14b Watershed Planning Unit's Comments on the Draft Action Agenda Update¹

February 3, 2012

Members of the WRIA 16 Watershed Planning Unit are pleased to submit comments on the Puget Sound Partnership's draft Action Agenda (AA). The AA is very long and filled with much information. Because of its length, it is difficult to review and provide relevant input. We hope that you will be able to add an executive summary in the next draft that will be easier for the public to read and understand.

The AA includes many good actions. We are especially pleased to see that some of our previous comments have been addressed. The Planning Unit strongly believes in the value of local input and we hope there are more opportunities for the Partnership to collaborate with local experts and agencies. It is very common, particularly in rural areas, for state or regional experts to rely on incomplete or inaccurate information because they are not familiar with the local environment and don't have local contacts for ground-truthing the data. We believe that watershed planning and implementation groups offer this local expertise and hope that the Partnership is taking advantage of the expertise offered by these groups throughout Puget Sound. Also, implementing the local watershed plans will get us a long way toward implementing the AA. These plans provide local, bottom-up input and oversight.

Support for 2008-09 Action Agenda

The WRIA 16 Planning Unit strongly supports nearly all of the actions included in the original Action Agenda. As the Partnership works on an update, the Planning Unit would like to see the following:

- What is the status of actions in the original Action Agenda? Please describe progress made and note any measurable results. If no progress is noted, please elaborate on whether this is because the action has not started, because no data are available to measure progress, or because the action has failed to achieve desired results.
- Please highlight all NEW actions that are being added to the Action Agenda and note the reasoning for the action, how progress will be measured, and when results should be expected.

¹ For questions or comments, please contact Susan Gulick of Sound Resolutions at (206) 548-0469 or by e-mail at Susan@Soundresolutions.com

- Please also note any actions in the original Action Agenda that are being deleted or substantially revised and explain the reasoning.

Priorities for Hood Canal

The following items should be the highest priority for Hood Canal Near-Term Actions:

Stream Aggradation

Stream aggradation and degradation is a major issue in WRIA 16. Stream beds have risen over 5-10 feet in areas due to aggradation. This results in seasonally-limited surface water going subsurface, which has dire consequences for salmonid habitat; particularly ESA listed Hood Canal Summer Chum. There has also been improper development that impairs alluvial systems. The AA should address how to manage future development so that it does not further impair alluvial processes.

The WRIA 16 Planning Unit conducted a stream impairment study that began to assess this problem but follow up is needed, particularly a field-based assessment of what is occurring in the uplands that is causing the aggradation and how this can be mitigated. Additional field assessment of the sources and amounts of aggradation in individual streams is also needed.

On-Site Septic Systems (OSS) and Other Waste Management Issues

It is important that financing is available for the repair and replacement of failing OSS. There is a need for adequate seed money for the loan program offered by Craft3 (formerly Enterprise Cascadia). Continuation of this public-private partnership is extremely important. It is also important to address the remaining questions about the contribution of OSS to nitrogen loads in the Canal.

There is also a need for adequate sanitary services at popular recreation sites around Hood Canal. The WRIA 16 Planning Unit has prepared a prioritized list of sites that need services but efforts to identify public or private funding have not been successful.

Monitoring

Hood Canal needs strong monitoring programs that include:

- Surface water quality and quantity, and
- Groundwater quality and water levels.

There are inadequate data for Hood Canal and monitoring is needed to track trends, measure progress, and identify emerging problems. Nearly everyone agrees on the need for monitoring but funding is inadequate. It is important for state, regional, and local entities to work together to find long-term funding for monitoring efforts, including funds for pollution identification and correction.

Collaboration with Local Agencies and Experts

It is very important that efforts to protect, restore and enhance Hood Canal are completed efficiently with the best science and data available. Because there are limited data on many aspects of Hood Canal's status and trends, it is imperative that state officials implementing the Action Agenda collaborate with local agencies and the local people who live and work on Hood Canal. There are

reports and documents with factual statements about Hood Canal that the local community knows are not accurate. It is very important to create a feedback loop within local watersheds to ensure that misinformation is corrected, innovative ideas are considered, and projects are effectively designed and efficiently implemented.

Overall Comments

Because the AA is so long, it is possible that some of these comments are addressed somewhere in the document and not noticed by reviewers. The following comments address items that should be added or emphasized in the AA.

- Nutrient loading and low DO is not mentioned under the key threats to Hood Canal or its tributaries, or under the opportunities, priorities and near term actions. It should be added.
- We are confused by the action area profiles within the AA. They are very inconsistent in format, content, and level of detail. We would like to see the AA broken out by action area, rather than having seemingly separate and disconnected sections for each action area. We are also confused by the role of the Hood Canal Integrated Watershed Plan within the AA. The document states that the Integrated Plan is “synonymous” with the AA. What does this mean exactly? Does this mean that all of the actions for Hood Canal will be driven by the integrated plan (and therefore that is the only document we should comment on?) or does it mean that all actions in this AA will be fully incorporated into the integrated plan? In general, a better explanation of the action area sections of the plans is needed.
- There are also too many near-term actions, as the AA notes. It will be impossible to get these all done. We recognize that you haven’t prioritized yet but it’s hard to comment on them without some prioritization. These near-term actions need to be incorporated into a two- year work plan that shows who will do what with what funding for year one and year two. WRIA groups are ready to efficiently implement and coordinate local projects but we cannot provide specific input on this until a draft work plan is provided.
- Potential legislative actions (page 15 and elsewhere) should address the need to remove the sunset on WRIAs and provide on-going funding.
- Within WRIAs there are individual agencies that have done a lot of planning and implementation. These efforts are not adequately acknowledged or incorporated into the AA.
- The AA has a tremendous focus on urban issues. The AA also needs to address rural issues, especially related to runoff. (See section C 2). Clearly there are urban stormwater issues that are not issues in rural areas; however there are key issues with rural runoff, such as flooding and stream aggradation, which are not adequately addressed.
- Instream flow discussions need to mention role of tribes and local governments. Having two state agencies listed as the two owners is not acceptable. This section needs to mention the

need for collaboration with WRIAs. Successful implementation of water management rules is dependent on the cooperation of tribes and local agencies.

- There are inadequate sanitary services along Hood Canal. State Parks should be commended for allowing non-permitted users to park for 15 minutes to use park bathrooms. However, additional sanitary services are needed and should be addressed by a myriad of state agencies (WDFW, Parks, DNR, etc.). The WRIA 16 Planning Unit, in collaboration with WDFW, has developed a prioritized list of needs. Collaboration between state agencies is necessary to get the services installed.
- There is a need for expansion and funding of CREP, as the AA mentions. However, references to CREP should also recognize the efforts of landowners' voluntary stewardship. These issues will not be solved through the efforts of agencies alone—it is important to stress the necessity of public-private cooperation. It would also be beneficial if there were technical and financial assistance for commercial and residential restoration of existing development (soil improvements, native plants, etc.).
- WRIA 16 agrees that enforcement of existing laws and regulations is very important and supports the actions in section C1.5. However this needs to be expanded to include local enforcement as well. It also needs to address funding needs; enforcement will not happen without dedicated funds.
- In Section C5.3 you reference the ongoing work of Enterprise Cascadia (which is now Craft3; this should be updated). However, you should add a specific near-term action to identify and provide adequate funding to endow this public-private effort with adequate funds to sustain its efforts over the long-term.
- There is a need for ongoing clean-up of marine debris in Hood Canal, particularly in the north end of the canal.
- WRIA 16 strongly supports the concepts in Section A2 to Permanently Protect the Intact Areas of the Puget Sound Ecosystem that still function well, and would like to see these concepts even more strongly emphasized throughout the Action Agenda. It is more effective to protect ecosystems than to correct them after they have been harmed. A good example of this type of effort is the Great Peninsula Forest and Bay project.
- The AA should address collaboration with military installations to explore options of mutual benefit for marine eco-system protection.
- The AA should address the potential impacts of ecological light pollution on habitat.
- Local action area agendas are very important. However, these sections in this plan are very inconsistent. It is unclear what their importance is, or how they are integrated into the near-term actions. For example, how are the unique challenges and science needs for Hood Canal reflected in the overall action agenda? The relationship between the AA/near-term actions and the local action agendas is unclear and confusing to readers.

- The Partnership needs to support and in some cases fund tangible projects that will both clean up local waters and help foster sustainable commercial activity.
- The Partnership should support (in more than lip service) the various local watershed councils and planning units with grants and technical assistance. These groups are natural supporters of the agency's goals and objectives, but have been marginalized by the Partnership's leadership. Involvement with these local groups would add needed credibility and buy-in with supporters and detractors alike, as well as offer local expertise and knowledge on key issues.
- The flow charts and diagrams within the Action Agenda are indecipherable. When you enlarge them to size that should be legible, the text quality is distorted and unreadable. There are no comments on these because no one could read them, so please don't assume lack of comments on these means readers agree with (or like) the diagrams. We hope to be able to review a legible version before the AA is finalized.

Specific Comments on the Action Agenda

Page #	Topic or Section	Issue	Comment
305	General	Notable Accomplishments	The Partnership appears to be taking credit for projects in which they are participants, and not the lead agency. Perhaps “Shared Accomplishments” would be a more accurate term. After all, this is a “Partnership” and therefore the language and sentiment should reflect it.
307	Key Threats/Pressures	List	The text says there are thirteen regional pressures but only lists eleven.
307	General	SMP	The City of Bremerton is not on Hood Canal
308	General	Example of “Protecting....forests and farms”	Development rights are purchased or waived, not “extinguished”.
311	References	Missing the PUD URLs: http://www.jeffpud.org/ http://www.masonpud1.org/ http://www.kpud.org/	Jefferson #1, Kitsap 1 and Mason 1 Public Utility Districts in the Hood Canal Action Area are active in both water supply and wastewater management and planning. Clallam has no Jurisdiction in the Action Area